



California Regional Water Quality Control Board

Central Coast Region



Linda S. Adams
Secretary for
Environmental Protection

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Arnold Schwarzenegger
Governor

October 15, 2009

Tully Clifford
Public Works Director
City of Solvang
1644 Oak Street
Solvang, CA 93463

Dear Mr. Clifford:

WATER BOARD STAFF COMMENTS ON CITY OF SOLVANG SEPTEMBER 2009 DRAFT STORMWATER MANAGEMENT PLAN, SANTA BARBARA COUNTY, WDID #3 42MS04028

On September 10, 2009, the Central Coast Regional Water Quality Control Board (Water Board) received the City of Solvang (City) September 2009 Draft Stormwater Management Plan (Draft SWMP). We previously reviewed the March 2009 draft and communicated comments and required revisions in a letter dated August 4, 2009. Water Board staff has reviewed the September 2009 Draft SWMP and finds that the City has incorporated many of the revisions we required in our August 4, 2009 letter.

The purpose of this letter is to identify further revisions that we require in order to recommend approval of the SWMP. We present the specific improvements that are needed in the attached Draft Table of Required Revisions. In addition, we have identified overarching issues with the SWMP that must be corrected; these are discussed following the SWMP Review Process section found immediately below. Please respond with a further revised SWMP, or comments describing further revisions to the SWMP, prior to the Water Board's final review and consideration of public comment.

SWMP Review Process

The following sequence of events describes an optimal process for final review of the SWMP.

Water Board staff plans to:

- 1) Post the September 2009 Draft SWMP on the Water Board website on or prior to October 19, 2009, for the 60-day public comment period. At the same time we will also post the attached Draft Table of Required Revisions. Water Board staff will announce the web posting, including web address, to all known interested parties by email.
- 2) At the close of the 60-day public comment period on approximately December 19, 2009, Water Board staff will review public comments on the SWMP, including comments from the City describing its revisions to the SWMP.

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- 3) Water Board staff will prepare a final Table of Required Revisions and a final recommendation on the adequacy of the SWMP. Staff will also prepare a response to comments received during the 60-day public comment period.
- 4) If Water Board staff recommends approval of the SWMP, the Water Board's Executive Officer may approve the SWMP and coverage under the General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (General Permit), contingent on the City making the required revisions to the SWMP by a date certain (generally within 60 days of the approval letter). The Executive Officer will post the approval letter with required revisions on the Water Board website.
- 5) Alternatively, if during the 60-day public comment period the City or a member of the public requests a Water Board hearing, Water Board staff will provide recommendations to the Water Board on the City's SWMP, with the required revisions, at the February 4, 2010 Water Board Meeting.

Overarching Issues

BMP Table Format

The format of the BMP tables in the Draft SWMP makes it difficult to read the tables and locate information related to particular BMPs. You can find effective models for BMP tables in other municipalities' SWMPs. Water Board staff recommends looking at the BMP tables in the City of Santa Maria SWMP. You must revise the BMP tables to incorporate the following changes:

- Include the names of all BMPs;
- Separate BMPs (instead of combining them);
- Separate measurable goals to list only one measurable goal per "bullet";
- Organize implementation details, measurable goals, and effectiveness measures into separate columns;
- Ensure that measurable goals listed in the tables are consistent with the measurable goals in the BMP descriptions;
- Clarify the implementation schedule for each BMP and measurable goal (remove the "Year" column and add a column for each permit year); and
- Use a consistent format for BMP tables throughout the SWMP.

Implementation of Interim Hydromodification Control Criteria

The City must implement interim hydromodification control criteria approved by the Water Board for all new development and redevelopment projects by the beginning of the second permit year. Implementation of interim hydromodification control criteria by the beginning of the second permit year will require changes to the City's ordinances, conditions of approval, stormwater control BMP guidance resources, development plan review procedures, construction site inspection procedures, post-construction stormwater control BMP tracking procedures, long-term stormwater control BMP maintenance procedures, and staff training programs. However, the Draft SWMP does not include measures to support implementation of interim hydromodification control criteria in the second permit year for all of these areas. You must revise the SWMP to ensure that all authorities, programs, and procedures necessary to implement interim hydromodification control criteria are in place by the beginning of the second permit year.

Editing

The Draft SWMP contains many grammatical and punctuation errors. In addition, the Draft SWMP is difficult to read in many places because of complicated or incomplete sentence



structure. These errors make the SWMP difficult to understand. Please review the SWMP carefully, and revise it to correct these errors.

If you have any questions regarding this matter, please call **Jon Rohrbough** at (805) 549-3458 or at jrohrbough@waterboards.ca.gov, or Phil Hammer at (805) 549-3882.

Sincerely,

Roger W. Briggs
Executive Officer

Attachment: October 15, 2009 Draft Table of Required Revisions

cc (by email):

Shelly Ingram
Stormwater Compliance Officer
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9.09\Comments on Solvang 09-08-09 SWMP_10-08-09_final.doc



October 15, 2009

DRAFT TABLE OF REQUIRED REVISIONS
City of Solvang Draft Storm Water Management Program

Acronyms/Abbreviations:

BMP	- Best Management Practice
CASQA	- California Stormwater Quality Association
CBSM	- Community-Based Social Marketing
CEQA	- California Environmental Quality Act
City	- City of Solvang
LID	- Low Impact Development
MCM	- Minimum Control Measure
MEP	- Maximum Extent Practicable
MS4	- Municipal Separate Storm Sewer System
POC	- Pollutant of Concern
SBCAMM	- Santa Barbara County Association of MS4 Managers
SWMP	- Stormwater Management Plan
Water Board	- Central Coast Regional Water Quality Control Board

Item #	SWMP Section	Subject	Issue	Required Revisions
1	Whole Document	Editing	In several places throughout the Draft SWMP, the sentence structure makes the document difficult to read. The SWMP document must use language that is clear and accessible to readers.	Revise the SWMP to ensure that the document clearly communicates the City's meaning and intent.
2	Section I.10	Appendix D	The Draft SWMP states that a list of commercial and industrial facilities inspected by the City's Public Works Department is included in Appendix D. However, the Draft SWMP does not include Appendix D. (Table 6-1 contains a list of municipal operations covered by the SWMP, not a list of	Revise the SWMP according to one of the following options: <ul style="list-style-type: none"> • Delete the reference to Appendix D; or • Add Appendix D containing a list of privately-owned commercial and industrial facilities within the City that the Public Works Department inspects regularly.

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			commercial and industrial facilities within the City.)	
3	Section 1.7.1	Effectiveness Assessment	<p>The Draft SWMP states that the City will modify the stormwater program if the results of integrated assessment determine that BMPs are ineffective at achieving their intended outcomes. This is incomplete.</p> <p>The Draft SWMP states that the City will evaluate measurable goals for their ability to support the assessment of the six CASQA outcome levels. While measurable goals should allow for effectiveness measurements related to the six CASQA outcome levels, measurable goals must support and comply with General Permit conditions and the MEP standard.</p> <p>The Draft SWMP states that the City will identify assessment methods it will use to assess program and BMP effectiveness. However, the Draft SWMP does not state that the City will identify quantifiable effectiveness measures. The SWMP must specify what the City will measure to determine BMP and program effectiveness, not just the measurement tools the City will use.</p>	<p>Revise the SWMP to state that the City will modify the stormwater program and BMPs, as necessary, to achieve compliance with General Permit conditions, including the MEP standard and protection of water quality.</p> <p>Revise the SWMP to state that the City will evaluate measurable goals to determine their effectiveness at complying with General Permit conditions, protecting water quality, and reducing pollutants in stormwater to the MEP. In addition, include a statement that the City will modify its measurable goals to increase the effectiveness of its stormwater activities.</p> <p>Revise the SWMP to incorporate the following elements into the City's effectiveness assessment strategy:</p> <ul style="list-style-type: none"> • Identification of quantifiable measures, appropriate to each BMP, that assess effectiveness at achieving regulatory compliance, meeting measurable goals, changing awareness, changing behavior, and reducing pollutant loads, to be used during annual effectiveness assessments. (The <i>Municipal Stormwater Program Effectiveness Assessment Guide</i> includes useful examples and guidance for assessing effectiveness using these parameters); and

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				<ul style="list-style-type: none"> Identification of quantifiable measures that collectively assess program effectiveness in terms of runoff and receiving water quality, to be used during long-term effectiveness assessments (e.g., every three to five years).
4	Tables 1-2, 2-1, 3-4, 4-1, 5-1, and 6-3	Implementation Schedules	Each BMP table includes a column indicating implementation years and a column indicating measurable goals. However, the schedule in the "Years" column does not always agree with the schedule in the "Measurable Goals" column.	Revise the BMP tables to resolve the schedule conflicts. Water Board staff recommends using a table format similar to that in the City of Santa Maria SWMP.
5	Tables 1-2, 2-1, 3-4, 4-1, 5-1, and 6-3	Implementation Details	In the BMP tables, the column labeled "effectiveness measures" is confusing. The column contains a mixture of effectiveness measures, measurable goals, and BMP implementation details.	Revise the BMP tables to ensure that column titles and column content are consistent. Water Board staff recommends adding a separate column for implementation details.
6	BMPs PE.1, PE.2, PE.3, PE.4, PE.6, PE.7, PE.8, PI.1, PI.2, ID.3, ID.5, PC.6, and PP.2	Measurable Goals and Effectiveness Measures	The Draft SWMP contains many sound measurable goals. However, some of the statements the SWMP labels as measurable goals are actually effectiveness measures. In addition, each BMP table includes a column for effectiveness measures and a column for measurable goals, but each column actually contains a mixture of both. A measurable goal is a concrete numeric statement of a specific action the City will take to reduce pollutants in stormwater and protect water quality. An effectiveness measure is a numeric statement of what the City will measure to determine the effectiveness of its	Revise the SWMP to make a clear distinction between measurable goals and effectiveness measures. Where the SWMP contains paragraphs or columns labeled "measurable goals," ensure that the statements in those paragraphs and/or columns are measurable goals instead of effectiveness measures.



Item #	SWMP Section	Subject	Issue	Required Revisions
			actions to reduce pollutants in stormwater and protect water quality. Statements involving activities such as "document," "count," "compile," or "tabulate" are generally effectiveness measures, not measurable goals.	
7	BMP PE.9	Community-Based Social Marketing (CBSM)	In BMP PE.9, the Draft SWMP addresses the Water Board's requirement that all permittees assess CBSM strategies and incorporate them into their SWMPs. However, PE.9 describes a public survey to determine the effectiveness of the City's education program, not a plan to assess CBSM strategies. CBSM is a particular strategy for achieving behavior change through initiatives delivered at the community level which focus on removing barriers to an activity while simultaneously enhancing the activity's benefits.	Revise the SWMP to incorporate the following changes: <ul style="list-style-type: none"> • Re-title BMP PE.9 to reflect the public survey activity it describes; and • Create a new BMP to assess community-based social marketing strategies, and incorporate them into the City's program, where appropriate, by the end of year 3.
8	BMPs PE.2, PE.7, and PE.9	Public Survey	BMP PE.9 describes a public survey the City will conduct to determine the effectiveness of its public education program. However, the Draft SWMP also describes information and measurable goals related to the public survey in BMPs PE.2 and PE.7. This is confusing.	Revise the SWMP to move information and measurable goals related to the public survey out of BMPs PE.2 and PE.7, and into BMP PE.9.
9	BMP PE.1	Brochures	The Draft SWMP states that the City will distribute brochures at the annual clean-up day event, City offices, City Council and Chamber meetings, through enforcement activities, and through mail	Revise the SWMP to include a measurable goal to make the brochures available for viewing on the City's website. As a short term goal, include a measurable goal to make it possible, by the end of the first

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			by request. It is not clear that these methods will educate the public to the MEP.	permit year, for residents and business owners to request brochures through the website.
10	BMP PE.1	Brochures	The Draft SWMP states that the City will distribute brochures at the annual clean-up day event. However, the Draft SWMP states in BMP PE.3 that the City holds three annual clean-up day events.	Revise the measurable goal for BMP PE.1 to state that the City will distribute brochures at all clean-up day events attended by City staff.
11	BMP PE.2	Website	The Draft SWMP does not include measurable goals for website content.	Revise the SWMP to include measurable goals for website content, including a description of the stormwater content the City will make available on the website, and the frequency with which the City will update this information.
12	BMPs PE.3, PE.7, and PI.3	Public Events	The Draft SWMP includes information and measurable goals for public events/clean-up days in several BMPs. This is confusing.	Revise the SWMP to incorporate the following changes: <ul style="list-style-type: none"> • Move information and measurable goals related to conducting public events out of BMP PE.3, and into BMP PI.3; • Include measurable goals in BMP PE.3 for distributing educational materials at public events; and • Move information and measurable goals related to advertising public events out of BMP PE.7, and into BMP PI.3.
13	BMP PE.3	Public Events	The Draft SWMP states that the City holds three clean-up day events each year. However, the Draft SWMP does not include a measurable goal for the number of clean-up events City staff will attend each year for the purpose of distributing educational materials.	Revise the SWMP to clarify the number of clean-up events City staff will attend each year for the purpose of distributing educational materials.
			The Draft SWMP states that SWMP	Revise the SWMP to include Attachment B.

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			Attachment B contains a poster for display at public events. However, the Draft SWMP does not include Attachment B.	
14	BMP PE.4	Educational Programs for School Children	<p>The Draft SWMP describes activities the City conducted in the past. While these activities demonstrate the City's efforts to reduce pollutants in stormwater, the Draft SWMP should describe only activities the City plans to conduct in the future.</p> <p>The Draft SWMP states that City staff will meet with school staff biannually. However, this statement is not reflected in the measurable goals for this BMP.</p> <p>The Draft SWMP states that the City will educate 50% of school children every two years. However, it is unclear whether the City plans to provide stormwater-related instruction to school children or simply distribute activity materials.</p>	<p>Revise the SWMP to remove the description of past events.</p> <p>Revise the SWMP to include a measurable goal for meeting biannually with school staff.</p> <p>Revise the SWMP to specify that the City will provide stormwater-related instruction to 50% of school children (K-8) every two years, either through direct involvement of City staff or through the involvement of school teachers and/or staff.</p>
15	BMP PE.7	Direct Mail/Media Campaigns	The Draft SWMP states that the City will publish ads or articles in local newspapers as deemed appropriate and necessary. However, the Draft SWMP does not describe the criteria the City will use to make this determination. In addition, the Draft SWMP does not include this goal in Table 1-2.	Revise the SWMP to include a measurable goal for the number or frequency of newspaper ads or articles the City will publish each year. Or, as another option, include measurable goals for the circumstances in which the City will publish ads and/or articles. Include the new measurable goal in Table 1-2.

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16	BMPs PE.2, PE.7, and PE.9	Public Survey	The Draft SWMP includes information and measurable goals related to a public survey in several BMPs. This is confusing.	Revise the SWMP to move information and measurable goals related to the public survey out of BMPs PE.2 and PE.7, and into BMP PE.9.
17	BMP PE.8	Business Outreach	<p>The Draft SWMP states that the City will distribute information sheets and brochures to applicants seeking zoning clearance. However, it is unclear how these materials are related to stormwater.</p> <p>The Draft SWMP states that the City will distribute information sheets and brochures to businesses, and provide brochures and posters targeting businesses in City offices and during site visits. However, the Draft SWMP does not include a measurable goal to develop and adopt such materials.</p> <p>The Draft SWMP states that City staff will ask business owners whether they are familiar with the stormwater program. However, asking this question will not give the City information about business owners' knowledge of, and compliance with, City stormwater requirements.</p> <p>The Draft SWMP mentions conducting site visits for businesses in the City. However, the Draft SWMP does not describe the purpose or stormwater-</p>	<p>Revise the SWMP to include a description of stormwater-related informational materials the City will provide to zoning clearance applicants.</p> <p>Revise the SWMP to include measurable goals, including a schedule, to develop and adopt information sheets, brochures, and posters targeting the business types listed in the Draft SWMP.</p> <p>Revise the SWMP to state that City staff will ask business owners something like the following: "Are you aware of the City's stormwater requirements for your type of business? Is your business in compliance with the City's stormwater requirements?" In addition, include a measurable goal to inspect businesses for compliance with City stormwater requirements.</p> <p>Revise the SWMP to incorporate the following elements:</p> <ul style="list-style-type: none"> • A description of what the City intends to achieve with the site visits;

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			related goals of the visits, or provide a measurable goal for the number of visits City staff will perform each year.	<ul style="list-style-type: none"> Measurable goals for the visits ensuring they achieve the City's purpose in conducting the visits; and Measurable goals for the number or percentage of businesses City staff will visit each year.
18	BMP PI.2	Attendance at Regional Meetings	The Draft SWMP states that City staff will attend 80% of available meetings annually. This is vague.	Revise the SWMP to include a statement that City staff will attend three out of four quarterly SBCAMM meetings and five out of six bimonthly CASQA meetings each year.
19	BMP PI.3	Advertising Community Clean-up Days	The Draft SWMP states that the City will advertise community clean-up events in at least one radio spot and through the local newspaper. However, the City has additional means of promoting clean-up days.	Revise the SWMP to incorporate the following elements: <ul style="list-style-type: none"> A statement that the City will advertise all three clean-up day events the City holds; A statement that the City will advertise clean-up day events on the City website; and A statement that the City will notify people on the interested parties list prior to each clean-up day event.
20	BMP PI.3	Household Hazardous Waste	The Draft SWMP includes a goal for advertising the Buellton household hazardous waste facility in BMP PI.3. This is confusing.	Revise the SWMP to include a separate BMP for advertising the household hazardous waste facility in Buellton. The BMP should include concrete numeric measurable goals for the mode and frequency of the advertising.
21	Public Involvement/ Participation	Interested Parties List	The Draft SWMP describes only one avenue available to the public for joining the interested parties list (signing up at annual public meetings). Since the purpose of an interested parties list is to give the public a means of obtaining stormwater information they might not receive through other means, limiting	Revise the SWMP to include measurable goals to establish additional means by which the public can join the interested parties list, such as information and a sign-up opportunity on the website and at clean-up days, and information in brochures pointing to the website opportunity. Since the interested parties list involves more than the

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			<p>the list to those who attend public meetings will not adequately promote public involvement in the City's stormwater program.</p> <p>The Draft SWMP states that interested parties will be asked to sign a request form, and that City will send the requested information. However, members of the public will not always know what to ask for.</p>	<p>public meetings, Water Board staff recommends creating a separate BMP for the interested parties list for clarity and to track implementation and effectiveness of the activity.</p> <p>Revise the SWMP to include a measurable goal to send information to interested parties about all upcoming stormwater-related events, (such as clean-up days, public meetings, and regional stormwater meetings), changes to the stormwater program, and stormwater program news.</p>
22	BMP PI.4	Hotline	According to the Draft SWMP, BMP PI.4 addresses the water quality hotline. However, the BMP is entitled "Additional Measures." This is confusing.	Revise the SWMP to change the name of BMP PI.4 to "Water Quality Hotline."
23	Illicit Discharge Detection and Elimination	Certified Stormwater Inspector	The SWMP states that the City's staff will include at least one certified Stormwater Inspector. However, the Draft SWMP does not reflect this statement as a measurable goal or include it in Table 3-4.	Revise the SWMP to include a measurable goal, with a schedule, to include a certified Stormwater Inspector on the City's staff.
24	Section 3.1	Uncontaminated Groundwater Infiltration	Uncontaminated groundwater infiltration refers to uncontaminated groundwater which seeps into storm drain pipes, basins, or other facilities from the surrounding soil. It does not refer to sanitary sewer overflows, illicit connections, or groundwater infiltration into the sanitary sewer system.	Revise the SWMP to reflect the correct meaning of the phrase "uncontaminated groundwater infiltration."
25	BMP ID.2	Stormwater Ordinance	The Draft SWMP states that the City will evaluate the scope of existing ordinances at the completion of year 1.	Revise the SWMP to clarify whether the City will evaluate the scope of existing ordinances during or after year the first permit year.

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			<p>This sentence is unclear.</p> <p>The Draft SWMP states that the City will initiate the need for an additional ordinance in year 2. This sentence is unclear.</p>	<p>Revise the SWMP to state that the City will determine the need for a new ordinance in year 2.</p>
26	BMP ID.3	Commercial Training Events	The Draft SWMP mentions commercial training events, but does not describe this activity or include measurable goals for the activity.	<p>Revise the SWMP to include a description of the commercial training event activity. Include measurable goals related to the purpose, content, and frequency of the events, and for public participation in them.</p>
27	BMP ID.3	Low Impact Development (LID)	The description of BMP ID.3 contains information and measurable goals related to LID education and implementation. These actions are not related to illicit discharge detection and elimination, and therefore these references are confusing.	<p>Revise the SWMP to move the LID reference out of BMP ID.3, and into BMP PC.6.</p>
28	BMP ID.4	Pocket Guide	The Draft SWMP states that the City will use the City of Santa Maria illicit discharge detection and elimination pocket guide. However, the Draft SWMP does not include this statement as a measurable goal, or explain how the City will use the pocket guide.	<p>Revise the SWMP to incorporate the following elements:</p> <ul style="list-style-type: none"> • A description of how the City will use the pocket guide; and • A numeric measurable goal to train illicit discharge detection and elimination staff in the use of the pocket Guide.
29	BMP ID.4	Measurable Goals	The Draft SWMP does not include measurable goals in the text description of this BMP.	<p>Revise the SWMP to include all measurable goals from Table 3-4 in the text description of this BMP.</p>
30	BMP ID.5	Measurable Goals	<p>The Draft SWMP does not include measurable goals in the text description of this BMP.</p> <p>The City has deleted the description of its spill/complaint response procedures.</p>	<p>Revise the SWMP to include all measurable goals from Table 3-4 in the text description of this BMP.</p> <p>Revise the SWMP to reinstate the description of the City's spill/complaint response</p>

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			<p>The City has deleted the description of its field investigation and abatement procedures.</p> <p>The City has deleted the description of County Environmental Health Services activities.</p> <p>The City has deleted the description of County Fire Department Activities.</p>	<p>procedures.</p> <p>Revise the SWMP to reinstate the description of the City's field investigation and abatement procedures.</p> <p>Revise the SWMP to reinstate the description of County Environmental Health Services (EHS) activities. Also, include a measurable goal to collect, analyze, and summarize the results of County EHS activities in the City's annual reports.</p> <p>Revise the SWMP to reinstate the description of County Fire Department Activities. Also, include a measurable goal to collect, analyze, and summarize the results of County Fire Department activities in the City's annual reports.</p>
31	BMP ID.6	Wastewater Programs	<p>The description of BMP ID.6 contains information and goals related to sanitary sewer system maintenance, the wastewater treatment plant, pre-treatment inspections, the sanitary sewer overflow program, creek inspections, responding to septic inspection reports, and tracking inspection results. It is not clear how these activities relate to one another or how they related to stormwater quality.</p> <p>The Draft SWMP's description of BMP ID.6 includes a measurable goal for creek inspections. This goal more</p>	<p>Revise the SWMP to clarify and simplify this BMP. Remove information that is not related to the City's stormwater quality protection efforts. Move information and goals related to other BMPs out of BMP ID.6 and into the relevant BMPs. Where necessary, create additional BMPs to describe distinct activities. In addition, ensure that the SWMP includes concrete measurable goals for all described activities.</p> <p>Revise the SWMP to move the creek inspection measurable goal out of BMP ID.6, and into BMP ID.5.</p>

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			properly belongs in BMP ID.5.	
32	BMP ID.7	Mutt Mitt Program	The Draft SWMP describes a mutt mitt program, but does not include a measurable goal to keep stations stocked with the mitts.	Revise the SWMP to include a measurable goal to keep mutt mitt stations stocked throughout the City.
33	Table 4-1 and Table 6-3	Table Organization	Some of the BMP tables list BMPs more than once, and combine different BMPs and measurable goals. This format is confusing, and may be an indication that the City's BMPs and/or measurable goals overlap and are not distinct. As a result, it is difficult to relate the information in the tables to the text description of the BMPs and measurable goals.	Revise the SWMP so that the format of the tables follows the format of the BMP descriptions. If necessary, reorganize the BMPs and measurable goals themselves to make them more clear, straightforward, and focused.
34	Section 4-2	Stormwater Ordinance	The SWMP states that the City will review its current stormwater ordinance for compliance with General Permit requirements. However, the Draft SWMP does not include this statement as a BMP or express it as a measurable goal. In addition, BMP CS.1 (Inspections) includes a statement that the City will review its Excavation and Grading Code and revise it, if necessary. However, construction site inspection is only one of the topics the General Permit requires the City address in its stormwater ordinance.	Revise the SWMP to include a BMP to develop, adopt, and implement a stormwater ordinance. The BMP must incorporate the following elements: <ul style="list-style-type: none"> • A statement that the City will enforce current stormwater codes and/or ordinances at 100% of construction sites, until such time as the current codes and/or ordinances are replaced by revised codes and/or ordinances; • A statement that the City will evaluate the effectiveness of current stormwater codes and/or ordinances and whether they comply with all General Permit requirements; • A statement that the City will modify its current stormwater codes and/or ordinances, if necessary, to comply with all General Permit requirements; and

Item #	SWMP Section	Subject	Issue	Required Revisions
				<ul style="list-style-type: none"> A statement that the City will implement and enforce the new ordinance, including a schedule for when the City will develop, adopt, and implement the new codes and/or ordinances.
35	BMPs CS.1, CS.3, CS.4, CS.5, and PC.1	Compliance with the General Permit	The Draft SWMP states in several places that the City's activities will conform to the Caltrans Stormwater Management Protection BMP Manual and/or accepted practices. This is inadequate. Where these standards and practices conform to General Permit conditions and City standards adopted under the SWMP, the City may be guided by them in its activities; however, the City's stormwater activities must comply with the requirements of the General Permit and City standards adopted under the SWMP.	Revise the SWMP to state that the City's activities will comply with General Permit requirements and City standards adopted under the SWMP.
36	BMP CS.1	Inspections	<p>The Draft SWMP's description of BMP CS.1 contains information and measurable goals related to other BMPs. This is confusing.</p> <p>The Draft SWMP states that the City will perform construction site inspections,</p>	<p>Revise the SWMP to incorporate the following changes:</p> <ul style="list-style-type: none"> Move the statement about conditions of approval out of BMP CS.1, and into BMP CS.3; Move the statement about SWPPP requirements out of BMP CS.1, and into BMP CS.3; and Move the measurable goal to evaluate and modify the Excavation and Grading Code out of BMP CS.1, and into the stormwater ordinance BMP. <p>Revise the SWMP to state that, at a minimum, the City will inspect construction</p>

Item #	SWMP Section	Subject	Issue	Required Revisions
			but does not include measurable goals for inspection frequency.	sites at least monthly and prior to forecasted rainfall events.
37	Section 4	Construction Site Plan, Grading/ Erosion Control Plan, and SWPPP Review	The Draft SWMP states that the City will require grading/erosion control plans, construction site plans, and SWPPPs for construction sites. However, the Draft SWMP does not include measures to review these plans and SWPPPs for compliance with General Permit conditions and City standards developed under the SWMP.	<p>Revise the SWMP to include a BMP to review grading/erosion control plans, construction site plans, and SWPPPs, incorporating the following elements:</p> <ul style="list-style-type: none"> • A statement that the City will require, for all sites, construction site plans indicating the location of all BMPs; • A statement that the City will require grading/erosion control plans for construction projects disturbing more than 30 cubic yards of soil; • A statement that the City will require a SWPPP and proof of having submitted a NOI to the State Water Resources Control Board from all construction projects regulated by the State Construction Stormwater General Permit; • A statement that the City will develop authority for plan review meeting General Permit conditions; • A statement that the City will review and approve grading/erosion control plans, construction site plans, and SWPPPs prior to approving construction permit applications; and • Criteria the City will use to review and approve grading/erosion plans, construction site plans, and SWPPPs.
38	Section 4	Construction Site Plan, Grading/ Erosion Control Plan, and SWPPP	The SWMP does not include procedures for reviewing grading/erosion control plans, construction site plans, and SWPPPs.	Include a BMP to develop procedures for reviewing grading/erosion control plans, construction site plans, and SWPPPs. The BMP should include the following elements:

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		Review Procedures	The City is required to develop, implement and enforce procedures for construction site plan review which incorporate consideration of potential water quality impacts.	<ul style="list-style-type: none"> • The objectives the plan review process will be designed to achieve, consistent with General Permit requirements; • Quantifiable goals to ensure that site plan procedures achieve desired results; • A clear schedule for when the new review procedures will be completed, adopted, and implemented; and • A statement that the City will evaluate the effectiveness of the new review procedures and revise them as necessary.
39	Section 4	Procedures for Receipt and Consideration of Information Submitted by the Public	While the SWMP mentions receiving comments on construction site BMP requirements at annual public workshops, the SWMP does not include specific measures for receiving and considering information submitted by the public on construction site BMP performance. The City is required by the General Permit to include in its stormwater program an avenue for members of the public to report failed or improperly installed construction site BMPs.	<p>Include a BMP to receive and consider information submitted by the public. The BMP should incorporate at least the following elements:</p> <ul style="list-style-type: none"> • Procedures for documenting and responding to information from the public regarding potential State and City permit violations on construction sites; and • Measures to educate the public on how to recognize and report potential permit violations of State and City permit conditions at construction sites. <p>In addition, include this topic in the training provided to staff that will receive and respond to the information submitted by the public.</p>
40	Section 5	Supplemental Provisions (Attachment 4)	The Draft SWMP does not yet state that the City will apply the requirements contained in General Permit Attachment 4 to all projects falling into one of the seven categories listed in Attachment 4. While the City does not exceed the	Revise the SWMP to include a BMP, with numeric measurable goals and an implementation schedule, to incorporate Attachment 4 requirements into the City's development policies, standards, conditions of approval, design standards, and review

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			population or growth rate thresholds defined by the General Permit, the Water Board has determined that all permittees must comply with Attachment 4 requirements, regardless of size or growth rate, in order to achieve the MEP standard.	processes.
41	BMP PC.1	Review Regulations	<p>The Draft SWMP states that the City will evaluate and recommend modifications to its General Plan, SWMPP [sic], CEQA checklist, conditions of approval, engineering conditions of approval, conceptual review process, and all municipal codes by the end of the second permit year. However, this schedule is not adequate to comply with the Water Board's requirement to implement interim hydromodification control criteria by the beginning of the second permit year.</p> <p>The Draft SWMP refers to a "SWMPP." It is unclear whether the City is referring to the SWMP or to a SWPPP.</p> <p>The Draft SWMP states that the City will enforce and apply existing codes, conditions of approval, and requirements imposed by the General Permit to 100% of all projects as determined applicable. However, the Draft SWMP does not describe the applicability criteria the City will use to make this determination.</p>	<p>Revise the SWMP to include a statement that the City will modify these plans, policies, requirements, and ordinances in order to implement interim hydromodification control criteria by the beginning of the second permit year.</p> <p>Revise the SWMP to clarify the City's meaning.</p> <p>Revise the SWMP to include a description of the criteria the City will use when deciding the applicability of existing codes, conditions of approval, and General Permit requirements.</p>



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42	BMP PC.1	Format	The Draft SWMP contains statements that appear out of place in the structure of the document. This is confusing.	Revise the SWMP to incorporate the following changes: <ul style="list-style-type: none"> • Move the statement about modifying the CEQA checklist out of the "Water Quality Protection Policies" paragraph, and into the "CEQA Checklist" paragraph; and • Move the statement about training out of the "CEQA Checklist" paragraph, and into BMP PC.2.
43	BMPs PC.1, and PC.3	Long-term BMP Maintenance Plan	The Draft SWMP includes information and measurable goals related to long-term maintenance of post-construction stormwater control BMPs in several BMPs. This is confusing and makes it difficult for readers to locate the information.	Revise the SWMP to organize all of the information and measurable goals related to long-term maintenance of post-construction stormwater control BMPs into a single BMP.
44	BMP PC.2	Staff Training	The Draft SWMP states that the City will provide training related to post-construction stormwater control to all staff beginning in the second permit year. However, this schedule is not adequate to comply with the Water Board's requirement to implement interim hydromodification control criteria by the beginning of the second permit year.	Revise the SWMP to include a statement that the City will train plan review, inspection, and enforcement staff in order to implement interim hydromodification control criteria by the beginning of the second permit year.
45	BMP PC.4	Master Drainage Plan	The Draft SWMP indicates that the City's Master Drainage Plan will provide opportunities for including new development strategies protecting water quality. However, the Draft SWMP does not describe how the Plan will accomplish this, or how the City will use the Plan to achieve water quality	Revise the SWMP to describe how the Plan will protect water quality, and how the City will apply the Plan to achieve this objective.

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			protection objectives.	
46	BMP PC.5	Format	The description of BMP PC.5 includes the phrase, "The BMP should state that." Since BMP PC.5 is the BMP intended by this phrase, the wording is unnecessary and confusing.	Revise the SWMP to delete the words "The BMP should state that" from BMP PC.5.
47	BMP PC.5	Riparian Protection	The Draft SWMP does not yet include a measure to establish riparian buffer requirements to protect aquatic and riparian habitat from damage and development. For instance, Santa Barbara County has a statute requiring a 100-foot setback from all waterbodies.	Revise BMP PC.5 to specify the setback criteria the City will use to protect riparian habitat and waterbodies from the impacts of development. The City's riparian buffer width must be a minimum of 30 feet from the top-of-bank of any waterbody (including lakes, rivers, creeks, and intermittent creeks).
48	BMP PC.5	Measurable Goals	BMP PC.5 includes a measurable goal related to interim hydromodification control criteria. This goal should be included as part of BMP PC.6.	Revise the SWMP to move the measurable goal related to interim hydromodification control criteria out of BMP PC.5, and into BMP PC.6.
49	BMPs PC.1 and PC.6	Low Impact Development (LID)	In response to Water Board staff comments, the Draft SWMP includes a statement that municipalities must maximize LID. However, since in some cases maximizing LID is not ideal, the Water Board has determined that permittees must optimize, rather than maximize, LID.	Revise the SWMP to modify the statement to read that municipalities must optimize LID.
50	BMP PC.6	LID	<p>The Draft SWMP states that the City will require LID elements in all projects meeting current, interim, and final hydromodification control minimum thresholds. This is inadequate.</p> <p>The Draft SWMP states that the City will require LID elements. This is vague.</p>	<p>Revise the SWMP to state that the City will require all applicable projects to optimize LID, regardless of hydromodification control thresholds, and include this statement as a measurable goal.</p> <p>Revise the SWMP to incorporate the following elements:</p> <ul style="list-style-type: none"> • Specific numeric measurable goals for the

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				<p>use of LID, including criteria for the selection and performance of controls;</p> <ul style="list-style-type: none"> • An implementation plan that includes a list of the policies, codes, ordinances, and standards City will need to revise; and • An implementation schedule.
51	BMP PC.7	Final Hydromodification Control Criteria Selection	<p>The Draft SWMP states that the City will adopt hydromodification control criteria developed by another municipality and approved by the Water Board. However, the Draft SWMP does not describe the criteria the City will use to evaluate and select already-developed hydromodification control criteria to ensure that they are protective of City's watershed conditions.</p> <p>In addition, the Draft SWMP states that the City may adopt hydromodification control criteria developed by the Central Coast LID (CCLID) Center. However, the joint effort to develop hydromodification control criteria, to be managed by the CCLID Center, has not yet been initiated. Moreover, participation in the joint effort will involve inclusion of specific BMPs in the SWMP. Discussion of the joint effort should not be included in the Draft SWMP until the joint effort has been initiated and the BMPs developed. At that time, the SWMP may be modified to address the joint effort.</p>	<p>Revise the SWMP to incorporate the following changes:</p> <ul style="list-style-type: none"> • Describe the criteria the City will use to evaluate and select already-developed hydromodification control criteria to ensure that they are protective of the City's watershed conditions; and • Remove the statement and measurable goal that the City may adopt hydromodification control criteria developed by the LID Center.

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52	BMP PC.3	Inspections	The Draft SWMP does not state that the City will inspect post-construction stormwater control BMPs. The City is responsible to perform site inspections that ensure pollutant discharges are reduced to the MEP.	Revise the SWMP to include a statement that the City will inspect post-construction stormwater control measures prior to project completion for new development and redevelopment projects. The BMP should include numeric specific measurable goals for site inspection (e.g., no final approval for projects until post-construction stormwater controls are inspected, tested, and functioning as designed).
53	Section 5	Inspection Checklist	The Draft SWMP does not include a plan to develop an inspection checklist. The inspection checklist in project SWPPPs is for the developer's use; the City is still responsible to perform site inspections that ensure pollutant discharges are reduced to the MEP.	Revise the SWMP to include a BMP to develop a checklist for inspecting post-construction stormwater control measures for new development and redevelopment projects that will comply with City requirements developed under the SWMP and achieve the MEP standard.
54	Section 5	Tracking System	The Draft SWMP does not include a plan to develop a system to track post-construction stormwater control BMPs for inspection, maintenance, and enforcement purposes. The City is responsible for ensuring the proper installation and function of all post-construction stormwater BMPs.	Revise the SWMP to include a BMP to track post-construction stormwater control measures from construction plan review through long-term maintenance.
55	Table 6-1	Footnotes	Table 6-1 in the Draft SWMP includes footnote references. However, the Draft SWMP does not include the footnotes themselves.	Revise the SWMP to include the footnotes.
56	BMP PP.1	Guidance Materials	The Draft SWMP states that the City will develop additional guidance materials if it deems such materials necessary, but does not describe the criteria the City will use to determine the need for	Revise the SWMP to include a statement that the City will evaluate existing BMP guidance materials on the basis of their adequacy to achieve the MEP standard, and will develop additional BMP guidance material if

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			additional guidance materials. The Draft SWMP states that the City will develop additional guidance materials if necessary, but then continues to refer to guidance materials as though they were already created. It is unclear whether the subsequent references to guidance materials refer to the CASQA Municipal Handbook or to additional materials developed by the City.	necessary. Revise the SWMP to clarify the City's use of the term "guidance materials" in BMP PP.1. If the subsequent references to guidance materials refer to materials developed by the City, include measurable goals and a schedule for developing and implementing the additional materials.
57	BMP PP.1	City-wide BMPs	The Draft SWMP mentions identifying and implementing BMPs for "other" municipal operations, but does not identify existing City-wide good housekeeping/pollution prevention BMPs, or include measurable goals for implementing them.	Revise the SWMP to incorporate the following elements: <ul style="list-style-type: none"> • A description of all BMPs the City currently implements to control the discharge of pollutants to stormwater or surface water from municipal operations, including specific numeric performance expectations; and • A statement that the City will implement all existing BMPs in the first, and all subsequent, permit years.
58	BMP PP.2	Contract Language	The Draft SWMP states that the City may reword contracts to require contractors to obtain City approval of BMPs or activity-related water quality plans. However, the Draft SWMP does not include criteria the City will use to determine whether to make this change.	Revise the SWMP to include criteria the City will use to determine whether to reword contracts to require contractors to obtain City approval of BMPs or activity-related water quality plans.
59	BMP PP.3	Staff Training	The Draft SWMP states that the City will determine the frequency of training based on the type of activity targeted. This statement conflicts with a later statement that the City will conduct	Revise the SWMP to resolve this conflict.

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			<p>annual training for all relevant staff.</p> <p>The Draft SWMP states that the City will provide annual training for all relevant staff beginning in year one, then states that the City will conduct annual training for all relevant staff in years 2 through 5. This is confusing.</p>	<p>Revise the SWMP to clarify that the City will train all relevant staff in existing good housekeeping/pollution prevention procedures in the first permit year, and will train all relevant staff in the modified good housekeeping/pollution prevention procedures beginning in the second permit year.</p>
60	Table 6-3	Measurable Goals	<p>Table 6-3 includes the measurable goal, "Evaluate 50% of projects at annual training peer review," for BMP PP.1/PP.3. This measurable goal is not consistent with the activities involved with either of these BMPs.</p>	<p>Revise the SWMP to remove this measurable goal and replace it with an appropriate measurable goal. In addition, include the new measurable goal in the text description of the relevant BMP.</p>
61	BMP GH.2	Cleaning Storm Drain Facilities	<p>The Draft SWMP states that the City will clean storm drain inlets, catch basins, and pipelines prior to the rainy season each year. However, the Draft SWMP does not mention cleaning open channels. In addition, the Draft SWMP does not include measurable goals for the number or percentage of facilities the City will clean each year.</p>	<p>Revise the SWMP to incorporate the following elements:</p> <ul style="list-style-type: none"> • A plan for cleaning open channels to remove debris, trash, and other pollutants prior to the rainy season, including concrete numeric measurable goals for this activity and a schedule indicating when the City will develop, adopt, and implement the plan; and • The number or percentage of facilities the City will clean each year.
62	BMP GH.2	Trash	<p>The Draft SWMP's description of BMP GH.2 includes measurable goals that are more closely related to other BMPs. This is confusing and makes it difficult to find and track these measurable goals.</p>	<p>Revise the SWMP to incorporate the following changes:</p> <ul style="list-style-type: none"> • Move the measurable goal related to emptying trash receptacles out of BMP GH.2, and into BMP GH.3; and • Move the measurable goal related to street sweeping out of BMP GH.2, and

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63	BMP GH.3	Measurable Goals	<p>The Draft SWMP includes the measurable goal that the City will empty public trash receptacles four times per week. However, the Draft SWMP does not include measurable goals for emptying the green waste or recycling bins.</p> <p>The Draft SWMP does not state that the City will continue the trash, green waste, recycling, and hazardous waste programs as ongoing BMPs.</p>	<p>into BMH GH.1.</p> <p>Revise the SWMP to include measurable goals for emptying the green waste and recycling bins.</p>
64	Section 7	General Permit	<p>The Draft SWMP mentions the State's draft General Permit. However, the General Permit was finalized and adopted by the State Water Resource Control Board in 2003.</p>	<p>Revise the SWMP to include a statement that the City will continue the trash, green waste, recycling, and hazardous waste programs as ongoing BMPs.</p> <p>Revise the SWMP to clarify that the General Permit is no longer in draft form.</p>
65	Appendix B	City Storm Drain Atlas	<p>General Permit Section D.2.c(2) requires permittees to develop a storm sewer system map showing the location of all waters of the U.S. and all discharges to those waters. However, the City Storm Drain Atlas does not identify waters of the U.S. or the City's stormwater system outfalls.</p>	<p>Revise the City Storm Drain Atlas to include clear identifiers for Adobe Canyon Creek, Alisal Creek, Alamo Pintado Creek, and the Santa Ynez River, and for the location of all City stormwater system discharges to these waters.</p>
66	Appendix C	Outreach Materials	<p>The Draft SWMP includes samples of City outreach materials in Appendix C. However, the Draft SWMP does not identify what the outreach materials are.</p>	<p>Revise the SWMP to include labels for all items shown in Appendix C.</p>
67	BMP Tables	Formatting	<p>The format of the BMP tables in the Draft SWMP makes it difficult to read the tables and locate information related to particular BMPs. You can find</p>	<p>Revise the BMP tables to incorporate the following changes:</p> <ul style="list-style-type: none"> • Include the names of all BMPs; • Separate BMPs (instead of



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			effective models for BMP tables in other municipalities' SWMPs. Water Board staff recommends looking at the BMP tables in the City of Santa Maria SWMP.	combining them); <ul style="list-style-type: none"> • Separate measurable goals to list only one measurable goal per "bullet"; • Organize implementation details, measurable goals, and effectiveness measures into separate columns; • Ensure that measurable goals listed in the tables are consistent with the measurable goals in the BMP descriptions; • Clarify the implementation schedule for each BMP and measurable goal (remove the "Year" column and add a column for each permit year); and • Use a consistent format for BMP tables throughout the SWMP.
68	Post-Construction	Interim Hydromodification Control Criteria	The City must implement interim hydromodification control criteria approved by the Water Board for all new development and redevelopment projects by the beginning of the second permit year. Implementation of interim hydromodification control criteria by the beginning of the second permit year will require changes to the City's ordinances, conditions of approval, stormwater control BMP guidance resources, development plan review procedures, construction site inspection procedures, post-construction stormwater control BMP tracking procedures, long-term stormwater control BMP maintenance procedures,	Revise the SWMP to ensure that all ordinances, conditions of approval, stormwater control BMP guidance resources, development plan review procedures, construction site inspection procedures, post-construction stormwater control BMP tracking procedures, long-term stormwater control BMP maintenance procedures, and staff training programs necessary to implement interim hydromodification control criteria are in place by the beginning of the second permit year.

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			and staff training programs. However, the Draft SWMP does not include measures to support implementation of interim hydromodification control criteria in the second permit year for all of these areas.	
69	All	Editing	The Draft SWMP contains many grammatical and punctuation errors. These errors make the SWMP difficult to understand.	Review the SWMP carefully, and revise it to correct grammatical and punctuation errors.